

EXHIBIT 1 – CLASS CERTIFICATION PLAN

Plaintiff's Position: Plaintiff respectfully submits that the 120-day deadline for class certification is impracticable given the complexity of this case. This matter is brought forth on behalf of a nationwide and CA subclass of consumers who were deceived by Defendant's "No Artificial Preservatives" labeling on its Good and Gather dip products. To prepare for class certification, Plaintiff will require extensive discovery, including the review of a substantial volume of corporate documents, the taking of multiple depositions pursuant to Rules 30(b)(6) and 30(b)(1), and the issuance and enforcement of subpoenas to third parties. These efforts will be both time- and resource-intensive.

Following class certification, the Parties will prepare for summary judgement. Plaintiff disagrees with Defendant's proposal to brief and decide summary judgment on Plaintiff's individual claims prior to class certification. Class certification is a threshold issue that should be resolved first, particularly where Plaintiff's claims turn on common questions—such as the falsity and materiality of Defendant's advertising representations—that impact all proposed class members. Proceeding in reverse risks prejudicing absent class members by adjudicating issues that may later be subject to classwide relief or liability. It also undermines judicial efficiency by encouraging piecemeal litigation and potentially duplicative motion practice if class certification is granted.

Defendant's proposal attempts to narrow the case prematurely and is inconsistent with the typical procedural order followed in false advertising class actions in federal court in California, where courts generally address class certification before reaching dispositive motions on the merits. Plaintiff therefore requests that the Court adopt a schedule that prioritizes class certification consistent with the standard practice in similar actions. *See Plaintiff proposed dates below.*

Defendant's Position: Defendant agrees that the 120-day deadline for class certification is impracticable in this matter. In particular, Defendant believes the

interests of judicial efficiency favor the parties briefing and the court deciding summary judgment on the named-Plaintiff's individual claims in advance of the class certification motion practice, as summary judgment on the Plaintiff's individual claims may be dispositive to the matter.

Event	Plaintiff's Proposed Date	Defendant's Proposed Date, Where Applicable.
Plaintiff's Deadline to complete fact discovery for purposes of Class Certification and for Purposes of the Named Plaintiff's Individual Claims; Last Day to File Class Certification Motion and Produce Expert Reports and Necessary Disclosures in Support of Class Certification	240 days after Defendant files answer to operative complaint - January 11, 2026	May 1, 2026
Defendant's Deadline to Complete Depositions & Document Production of Plaintiff's Experts re: Class Certification	60 days after filing class certification motion - March 12, 2026	June 15, 2026
Defendant's Last Day to File Opposition to Class Certification Motion; Defendant's Last Day to Produce Expert Reports And Necessary Disclosures re class certification in	90 days after filing class certification motion - April 11, 2026	July 15, 2026

Opposition to Class Certification		
Plaintiff's Deadline to Complete Depositions & Document Production of Defendant's Experts re: Class Certification	60 days after filing opposition to class certification motion - June 10, 2026	September 1, 2026
Plaintiff's Last Day to File Reply in Support of Class Certification Motion	90 days after filing opposition to class certification motion - July 10, 2026	October 1, 2026
Last Day to File Daubert Motions for Class Certification Experts	15 days after filing reply in support of class certification motion - July 25, 2026	October 15, 2026
Last Day to Oppose Daubert Motions for Class Certification Experts	30 days after filing of Daubert motions - August 24, 2025	November 5, 2026
Last Day to File Reply in Support of Daubert Motions for Class Certification Experts	15 days after filing of Daubert opposition papers - September 8, 2026	November 19, 2026
Proposed Hearing Date for Class Certification / Daubert Motions for Class Certification Experts	August 10, 2026	December 14, 2026
Non-Expert Discovery Cut-Off	March 6, 2026	January 11, 2026

Initial Expert Disclosure Deadline	April 24, 2026	November 1, 2025
Rebuttal Expert Disclosure Deadline	May 1, 2026	December 15, 2025
Expert Discovery Cutoff	May 15, 2026	January 26, 2026
Defendant's Last Day to File a Motion for Summary Judgment Directed to The Named Plaintiff's Claims	October 26, 2026	December 22, 2025
Plaintiff's Last Day to File Opposition to Motion for Summary Judgment	December 28, 2026	January 26, 2026
Defendant's Last Day to File Reply in further Support of Motion for Summary Judgment	January 15, 2027	February 15, 2026
Proposed Hearing Date for Motion for Summary Judgement	February 22, 2027	March 2, 2026